As an FCC licensed Amateur Radio operator living in metropolitan Washington DC I am gravely concerned over the demonstrated adverse impact of Broadband over Power Lines (BPL) on radio communication in the HF and lower VHF spectrum. This technology, known by various names throughout the world, has been studied extensively in the United States, Japan, the United Kingdom, the Netherlands, Germany, Finland, Norway and Poland. All such studies have lead to the conclusion that BPL poses a significant obstacle to reliable communication by stations licensed to operate in this spectrum. The implementation of BPL in Japan has already been cancelled as a result of the engineering analysis on the adverse impact this technology would have to licensed users of these frequencies.

Testing conducted and documented by the American Radio Relay League has demonstrated a raise in the noise floor on the order of 33.7 to 65.4 dB. Such an increase would render reception of HF and VHF communication impossible given the normal power levels used by Amateur Radio operators worldwide.

As a public service minded individual also licensed by the Army Military Affiliate Radio System (MARS) I am further concerned by the adverse impact the deployment of such a technology would have on my ability to continue to contribute in any meaningful way to the DOD support role which is at the core of the MARS mission.

The Commission has previously concluded that LF Power Line Carrier (PLC) systems would suffer harmful interference from Amateur stations located 950 meters from a power line carrying PLC, on frequencies where coupling is not particularly efficient. The utility industry argued with respect to PLC interference from Amateur stations that PLCs below 490 kHz would suffer harmful interference from 1 Watt EIRP amateur stations. The Commission used that as a premise in refraining from making an allocation for the Amateur Service near 136 kHz. Yet, the same industry, together with BPL manufacturers, now contends that at HF and VHF, where the power lines are better antennas than they are at LF, that BPL can co-exist with Amateur stations using more than 10,000 watts EIRP. Both arguments cannot be valid. It is incumbent upon the power utilities to demonstrate how an unlicensed technology operating under Part 15 of the Commission’s rules and regulations would avoid interfering with all licensed users of this spectrum.